

EXHIBIT B

IN THE UNITED STATES DISTRICT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

* * *

LISA BARBOUNIS,	:	CIVIL ACTION - LAW
Plaintiff	:	
	:	
vs	:	
	:	
MIDDLE EASTERN FORUM,	:	
et al.,	:	
Defendants	:	NO. 2:19-cv-05030

* * *

Videotaped deposition of STEVEN LEVY,
via video conference, taken on Tuesday, November 24,
2020, beginning at 2:03 p.m. before Pamela Pratt, via
video conference, Court Reporter and Notary Public in
and for the Commonwealth of Pennsylvania.

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ALSO PRESENT:

Mike Gannone - Videographer
Marc Fink
Gregg Roman
Daniel Pipes

I N D E X

* * *

WITNESS: Steven Levy

QUESTIONED BY: PAGE

Mr. Carson 5

E X H I B I T S

* * *

NUMBER	DESCRIPTION	MARKED FOR ID
(None marked.)		

<p style="text-align: right;">Page 4</p> <p style="text-align: center;">* * *</p> <p>(It is hereby stipulated and agreed by and among counsel for the respective parties that sealing, certification, and filing are waived and that all objections, except as to the form of the question, are reserved until the time of trial.)</p> <p style="text-align: center;">* * *</p> <p>THE VIDEOGRAPHER: We are now on the record. Today's date is Tuesday, November 24th, 2020 and the time is 2:03 p.m. Eastern Standard Time. This is the video-recorded deposition of Steven Levey in the matter of Lisa Barbounis versus Middle Eastern Forum, et al., in the United States District for the Eastern District of Pennsylvania, Case Number 219-cv-05030.</p> <p>My name is Michael Gannone from Everest Court Reporting and I am the video specialist. The court reporter today is Pam Pratt, also from Everest Court Reporting. All counsel appearing today will be noted on the stenographic record. Will the court reporter please swear in the witness.</p> <p style="text-align: center;">* * *</p> <p>STEVEN LEVY, having been first duly sworn, was examined and testified as follows:</p> <p style="text-align: center;">* * *</p>	<p style="text-align: right;">Page 6</p> <p>of answers don't have a lot of meaning on the record, so please keep all your answers verbal today, okay?</p> <p>A. Okay.</p> <p>Q. And it's important that we don't talk over each other. Sometimes you'll anticipate my question or I'll anticipate your answer, but it's hard for the court reporter to type two people talking at the same time. So, you know, we'll just try to avoid interrupting each other, okay?</p> <p>A. Okay.</p> <p>MR. WALTON: Hey, Seth, can we just have an agreement that it's usual stipulations, reserve all objections, except objections to form, until the time of trial and the witness will read and sign?</p> <p>MR. CARSON: Yes.</p> <p>MR. WALTON: Thank you.</p> <p>MR. CARSON: So noted.</p> <p>BY MR. CARSON:</p> <p>Q. And so you've been sworn by the court reporter today, so all your answers have the same force and effect as if you were testifying in a courtroom in a trial. So do you understand that?</p> <p>A. Yes.</p> <p>Q. Please state your full name for the record?</p> <p>A. Steven Mark Levy.</p>
<p style="text-align: right;">Page 5</p> <p>EXAMINATION</p> <p style="text-align: center;">* * *</p> <p>BY MR. CARSON:</p> <p>Q. Mr. Levy, my name is Seth Carson and we're here today to take a deposition for the matter of Lisa Barbounis versus Middle East Forum, Daniel Pipes and Gregg Roman. I represent the plaintiff who is Lisa Barbounis and we're going to take your deposition. So the first thing I'm going to ask you is, have you ever done a deposition before?</p> <p>A. Yes.</p> <p>Q. Okay. When's the last time you did a deposition?</p> <p>A. It was less than ten years ago. I'm not -- I have to think carefully about it. Certainly nine years ago and I may have had something more recent. It's been a few years.</p> <p>Q. Okay. Well, just -- I want to give you some ground rules just to try keep it running smooth. So it's a question-and-answer session. So I'll ask you questions and you'll provide responses -- any response that you want, yes, no, I don't know or you can say I don't remember, any other responsive answer you'd care to provide, but you have to keep all your answers verbal. So nods and shrugs, huh-uh, uh-huh, those types</p>	<p style="text-align: right;">Page 7</p> <p>Q. And Mr. Levy, what do you do for a living?</p> <p>A. I have a real estate business in New York City. We operate various kinds of commercial property and I am also responsible for a family office.</p> <p>Q. What's a family office?</p> <p>A. A family office is, I guess, a management office that runs the affairs of a family or even the extended family.</p> <p>Q. Okay. So that's for a particular family that you do that work for?</p> <p>A. My family.</p> <p>Q. Okay.</p> <p>A. My extended family.</p> <p>Q. Fair enough. And we're not really here today to talk about your personal business. We're here today to talk about your connection with the Middle East Forum, okay? So I guess that's, kind of, a good segue. Can you please describe briefly what your relationship is with the Middle East Forum?</p> <p>A. I'm currently chairman of the executive committee, have been for a number of years. I've been a contributor and supporter of Daniel's since he started.</p> <p>Q. What does it mean to be the chairman of the executive committee?</p> <p>A. Well, I moderate board meetings and pull the</p>

<p style="text-align: right;">Page 8</p> <p>1 executive committee together and we handle the affairs 2 of the organization.</p> <p>3 Q. You said that you moderate board meetings; is 4 that correct?</p> <p>5 A. Yes.</p> <p>6 Q. How often are board meetings held?</p> <p>7 A. Well, I would say once or twice a year. 8 Executive committee is probably two, three times a year.</p> <p>9 Q. So are -- board meetings and meetings of the 10 executive committee, are those two different things?</p> <p>11 A. Yes.</p> <p>12 Q. So I noticed on the website for Middle East 13 Forum there's a list of officers, there's a list of 14 people on the executive committee and there's also a 15 list of people on the board of governors. So is 16 there -- are there meetings where just the officers 17 attend? Are there any meetings like that?</p> <p>18 A. So if we have a high-level meeting that is 19 not specifically or formally the executive committee, 20 we -- I might huddle with one or two other lay leaders 21 and Daniel and Gregg about -- could be compensation 22 because we do that once a year. Or there may be a 23 particular matter that comes up ad hoc -- you could say 24 ad hoc committees but they're not even -- there's more 25 ad hoc -- sometimes just if the subject comes up, we</p>	<p style="text-align: right;">Page 10</p> <p>1 between the executive committee and the board of 2 governors?</p> <p>3 A. The executive committee in the organizations 4 I've been involved with is a small group of leaders who 5 actually help operate the organization whereas the board 6 tends to be a broader outreach to supporters and 7 interested parties to keep them informed, have them -- 8 equip them with information so that they can be 9 ambassadors for the organization and so on.</p> <p>10 Q. Regarding the executive committee meetings, 11 is that -- are there minutes kept at those executive 12 committee meetings?</p> <p>13 A. Not sure. We don't formally review them. If 14 they're kept, I'm not sure.</p> <p>15 Q. And Gregg Roman's position as secretary, that 16 is a position that exists in connection with the 17 executive committee?</p> <p>18 A. Yes.</p> <p>19 Q. And your position as chairman also exists in 20 connection with the executive committee, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And then just to round it out, Daniel Pipes's 23 position as president is in connection with the 24 executive committee, right?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 9</p> <p>1 pull in the people that are most likely to be 2 contributory.</p> <p>3 Q. So there are not -- so the regular meetings 4 then are relegated to meetings of the executive 5 committee and then meetings of the board of governors; 6 is that correct?</p> <p>7 A. Correct.</p> <p>8 Q. And is there a schedule -- are there -- let's 9 say just for the executive committee meetings first. Is 10 there a schedule where, you know, every year the 11 executive committee meetings are on such-and-such days?</p> <p>12 A. No.</p> <p>13 Q. They are scheduled as needed; is that fair to 14 say?</p> <p>15 A. Right.</p> <p>16 Q. And is that the same for the board of 17 governors meetings or the board meetings?</p> <p>18 A. Yes.</p> <p>19 Q. What is the executive committee?</p> <p>20 A. Well, typically -- in this case and 21 typically, it is the more operating end of the 22 governance of the entity. So board of directors may 23 meet and review things and vote on them, but all of the 24 work tends to happen at the executive committee.</p> <p>25 Q. And so how would you describe the difference</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. And vice chairman, Joshua Katzen, the same?</p> <p>2 A. Yes.</p> <p>3 Q. And treasurer, Lawrence Hollin?</p> <p>4 A. Yes.</p> <p>5 Q. Do you recall whether or not there were ever 6 matter -- issues related to allegations of sexual 7 harassment discussed at any of the meetings with the 8 executive committee?</p> <p>9 A. Nothing beyond a report to the board that 10 we're in litigation.</p> <p>11 Q. And that report to the board, that was made 12 at a board meeting, that was not an executive committee 13 meeting; is that right?</p> <p>14 A. Correct.</p> <p>15 Q. When did that notice of the litigation to the 16 board occur first?</p> <p>17 A. I think it was over a year ago. I could be 18 wrong about that.</p> <p>19 Q. And did that occur at a board meeting that 20 was in New York?</p> <p>21 A. Yes.</p> <p>22 Q. Was Janet Doerflinger at that meeting?</p> <p>23 A. Yes.</p> <p>24 Q. Were the allegations discussed at that 25 meeting?</p>

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<p>1 A. She raised questions.</p> <p>2 Q. Do you remember what questions she raised?</p> <p>3 A. I don't.</p> <p>4 Q. Do you remember how those questions were</p> <p>5 addressed?</p> <p>6 A. I don't remember the conversation.</p> <p>7 Q. Do you know whether or not the veracity of</p> <p>8 the allegations of sexual harassment were discussed?</p> <p>9 A. They must have been. I mean, if I had the</p> <p>10 transcript of that meeting in front of me, I could</p> <p>11 confirm that I -- you know, I could now recall that, but</p> <p>12 I -- you know, I don't remember the conversation.</p> <p>13 Q. There was a transcript from that meeting?</p> <p>14 A. I know of none.</p> <p>15 Q. Are there transcripts customarily taken at</p> <p>16 these board meetings?</p> <p>17 A. There are typically -- there are typically a</p> <p>18 minute -- there's typically a minutes.</p> <p>19 Q. And who takes those minutes?</p> <p>20 A. I'm not sure.</p> <p>21 Q. If I represent to you that the -- hang on one</p> <p>22 second, please -- that the Middle East Forum bylaws</p> <p>23 lists Gregg Roman as the secretary and that one of the</p> <p>24 duties of the secretary is to take minutes, does that</p> <p>25 help you remember who might have taken minutes at the</p>	<p>1 not have even been in -- I don't recall.</p> <p>2 Q. Okay. Did Daniel Pipes present information?</p> <p>3 And I'm specifically referring to information related to</p> <p>4 allegations that were made involving Gregg Roman and</p> <p>5 sexual harassments.</p> <p>6 A. Yes, he discussed the cases.</p> <p>7 Q. Prior to any litigation being filed, did you</p> <p>8 ever hear about any allegations of sexual harassment</p> <p>9 involving Gregg Roman?</p> <p>10 A. No.</p> <p>11 Q. And so part of the -- have you ever read the</p> <p>12 Complaint in this case, Mr. Levy?</p> <p>13 A. No.</p> <p>14 Q. Part of the -- I'll represent to you, part of</p> <p>15 the allegations in the Complaints involve a meeting that</p> <p>16 was held at the Middle East Forum's Philadelphia office</p> <p>17 on November 5th, 2018. And I was just -- my question</p> <p>18 is, do you have any knowledge related to that meeting</p> <p>19 that was held on November 5th, 2018 at the Philadelphia</p> <p>20 offices?</p> <p>21 A. No.</p> <p>22 Q. And I'll represent to you that meeting was</p> <p>23 held to discuss, among other things, issues related to</p> <p>24 allegations of sexual harassment. Does that ring any</p> <p>25 bells regarding whether or not you ever heard about or</p>
Page 13	Page 15
<p>1 board meetings?</p> <p>2 A. No. He may have taken the minutes or maybe</p> <p>3 somebody else did. As I said, generally I see minutes</p> <p>4 from board meetings, but I really don't pay too much</p> <p>5 attention to who did it.</p> <p>6 Q. Other than that instance at a board meeting</p> <p>7 in New York, were there any other times that you recall</p> <p>8 that issues related to allegations of sexual harassment</p> <p>9 were discussed by either the executive committee or the</p> <p>10 board?</p> <p>11 A. That's the only board meeting I recall. And</p> <p>12 as far as the executive committee is concerned, we must</p> <p>13 have discussed it prior to that board meeting that it</p> <p>14 was going to be brought up and Daniel and, I suppose,</p> <p>15 Gregg gave us a little bit of a briefing. We really</p> <p>16 haven't met this year, by the way.</p> <p>17 Q. I noticed that in 2019, the meetings were</p> <p>18 held at the end of the year. So is that customarily</p> <p>19 when these types of meetings take place is at year end?</p> <p>20 A. It depends. There's usually something in the</p> <p>21 fall and something in the spring.</p> <p>22 Q. At the executive committee meeting, did you</p> <p>23 say that Gregg Roman presented information to the</p> <p>24 executive committee?</p> <p>25 A. He may have. I assume that he did. He may</p>	<p>1 discussed at one of these meetings any allegations</p> <p>2 involving Gregg Roman?</p> <p>3 A. It was so long ago that Daniel let me know</p> <p>4 what was going on. Whether he spoke specifically about</p> <p>5 that meeting or informed me at the time, I just don't</p> <p>6 recall.</p> <p>7 Q. But sitting here today, you believe the first</p> <p>8 time you heard about these allegations would have been</p> <p>9 at the executive committee meeting in 2019?</p> <p>10 A. Yes, or a phone call from Daniel prior.</p> <p>11 Q. Do you specifically recall any phone call</p> <p>12 from Daniel prior?</p> <p>13 A. I mean, we talk from time to time. And it</p> <p>14 would be normal for him to let me know what was coming</p> <p>15 at the executive, so I assume that we had a</p> <p>16 conversation.</p> <p>17 Q. Are you basing that assumption just on your</p> <p>18 prior experience working with Mr. Pipes or do you have a</p> <p>19 specific memory of a call where you discussed these</p> <p>20 allegations prior to?</p> <p>21 A. It must have happened. I don't have a -- I</p> <p>22 don't have a specific memory of the conversation.</p> <p>23 Q. Do you remember anything that Mr. Pipes said</p> <p>24 to you during that conversation?</p> <p>25 A. Other than to the effect that he was very</p>

<p>Page 16</p> <p>1 upset that he was being sued -- he and Gregg were being</p> <p>2 sued and he felt it was very wrong.</p> <p>3 Q. Why did he say it was wrong?</p> <p>4 A. Because he described how none of it was true.</p> <p>5 Q. Did he tell you why he didn't think it was</p> <p>6 true -- the allegations were true?</p> <p>7 A. Well, I suppose if someone accused me of</p> <p>8 doing something and I knew I didn't do it, I would argue</p> <p>9 that it wasn't true.</p> <p>10 Q. But nobody accused Daniel Pipes of sexual</p> <p>11 harassment, though, right?</p> <p>12 A. I'm not sure of the specific allegations in</p> <p>13 the cases.</p> <p>14 Q. Do you know how many women over the last five</p> <p>15 years have reported sexual harassment involving Gregg</p> <p>16 Roman?</p> <p>17 A. I don't know the precise number.</p> <p>18 Q. If I told you it was eight, would that</p> <p>19 surprise you?</p> <p>20 MR. WALTON: Objection to form, but you</p> <p>21 can answer.</p> <p>22 THE WITNESS: I suppose it wouldn't</p> <p>23 surprise me considering that there are a handful</p> <p>24 involved with this case, if I'm correct -- cases, if I'm</p> <p>25 correct.</p>	<p>Page 18</p> <p>1 reporter for the Washington Examiner?</p> <p>2 A. Sex for stories?</p> <p>3 Q. Yeah.</p> <p>4 A. No, I've never heard that.</p> <p>5 Q. Have you ever heard a tape recording where</p> <p>6 she describes in detail her interaction with Gregg Roman</p> <p>7 where he commanded her to come to her [sic] hotel room</p> <p>8 that night and he would give her a good story in return?</p> <p>9 A. No.</p> <p>10 MR. WALTON: Objection to form.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. You never heard that recording?</p> <p>13 A. No.</p> <p>14 Q. Do you know whether -- so then you wouldn't</p> <p>15 have any knowledge whether Mr. Pipes ever even called</p> <p>16 these women to talk to them or interview them or ask for</p> <p>17 a statement from them in connection with these</p> <p>18 allegations?</p> <p>19 MR. WALTON: Objection to form. You can</p> <p>20 answer.</p> <p>21 THE WITNESS: No, I do not know of that.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Are these the type of allegations that you</p> <p>24 think would be important to know about when determining</p> <p>25 the veracity of other allegations of sexual harassment?</p>
<p>Page 17</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Have you ever heard of any allegations of</p> <p>3 sexual harassment involving women who weren't involved</p> <p>4 in these cases?</p> <p>5 A. I don't recall. I don't think so.</p> <p>6 Q. Did you know that a female employee named</p> <p>7 Tiffany Lee filed a charge of discrimination at the EEOC</p> <p>8 in 2016 accusing Gregg Roman of sexual harassment?</p> <p>9 A. That was mentioned to me over the summer,</p> <p>10 yes.</p> <p>11 Q. Over the summer of 2020?</p> <p>12 A. Yes.</p> <p>13 Q. Did you hear about it back in 2016?</p> <p>14 A. No.</p> <p>15 Q. Were you the --</p> <p>16 A. Or at least I don't recall hearing it.</p> <p>17 Q. And you were the chairman, though, of Middle</p> <p>18 East executive committee in 2016, correct?</p> <p>19 A. Yes.</p> <p>20 Q. Did you ever hear about an allegation that</p> <p>21 Gregg Roman had sex with a young intern named Leah</p> <p>22 Merville?</p> <p>23 A. I've never heard.</p> <p>24 Q. Have you ever heard about an allegation that</p> <p>25 Gregg Roman attempted to trade sex for stories with a</p>	<p>Page 19</p> <p>1 MR. WALTON: Objection to form. You can</p> <p>2 answer.</p> <p>3 THE WITNESS: I'm tempted to answer as a</p> <p>4 lawyer right now and I'm not a lawyer.</p> <p>5 BY MR. CARSON:</p> <p>6 Q. You can answer however you want to.</p> <p>7 A. I mean, I don't know that any allegations are</p> <p>8 relevant except for the ones that are actually being</p> <p>9 brought to court. They're just allegations, right?</p> <p>10 Q. Agreed. But do you -- would you agree that</p> <p>11 there is a certain number of allegations that can be</p> <p>12 made where organizations might take a position with</p> <p>13 regard to protecting the organization and weigh that</p> <p>14 over confirming the veracity of the allegations? If you</p> <p>15 understood that question, you're a better person than I</p> <p>16 am.</p> <p>17 MR. WALTON: Yeah, I was going to object</p> <p>18 to that one.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Strike that. I'll ask a better question.</p> <p>21 Let me think. So have you ever heard of an allegation</p> <p>22 involving a female employee named Laura Frank? And by</p> <p>23 that, I mean allegation of sexual harassment involving</p> <p>24 Gregg Roman.</p> <p>25 A. I'm trying to place the name. I may have</p>

<p>1 heard of it, but I don't recall the name.</p> <p>2 Q. Have you ever heard of an allegation of a</p> <p>3 female employee regarding sexual harassment and Gregg</p> <p>4 Roman by an employee named Lara Szott?</p> <p>5 A. Iris?</p> <p>6 Q. Lara Szott.</p> <p>7 A. Lara Szott. No. I mean, I think in a couple</p> <p>8 of the times that Daniel briefed me, he mentioned a</p> <p>9 bunch of names. But I'm not good with names anyway, so</p> <p>10 if I speak to him once every three months on the subject</p> <p>11 and he mentions a name, I won't remember it the next</p> <p>12 time, so...</p> <p>13 Q. Just to be -- for the record, how about</p> <p>14 Lara -- strike that. How about Gabrielle Bloom?</p> <p>15 A. Maybe. I don't know.</p> <p>16 Q. Do you know what the allegations are that my</p> <p>17 client, Lisa Barbounis, has made involving Gregg Roman?</p> <p>18 A. I'm sorry. Say that again. I didn't quite</p> <p>19 hear it. You trailed off.</p> <p>20 Q. Do you know -- I'll speak up. Do you know</p> <p>21 what the allegations are that my client, Lisa Barbounis,</p> <p>22 made in connection with Gregg Roman and sexual</p> <p>23 harassment?</p> <p>24 A. I could not list the specific allegations.</p> <p>25 But I know in general, she, I guess, feels sexually</p>	<p>Page 20</p> <p>1 allegations -- any of them?</p> <p>2 A. Yes, he assured me that they were all</p> <p>3 spurious.</p> <p>4 Q. Did he say that were all spurious based on</p> <p>5 his personal opinion or did he say that they were all</p> <p>6 spurious based on some sort of investigation that was</p> <p>7 performed?</p> <p>8 A. I don't recall the conversation well enough</p> <p>9 to state affirmatively one way or the other, but I</p> <p>10 wouldn't doubt if he had given me steps that he had</p> <p>11 taken.</p> <p>12 Q. Do you know what any of the steps were that</p> <p>13 he took to investigate these allegations?</p> <p>14 A. I don't. I don't recall.</p> <p>15 Q. Do you know how long his investigation took?</p> <p>16 A. No.</p> <p>17 MR. WALTON: Objection to form. You can</p> <p>18 answer.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Have you ever seen any document related to</p> <p>21 Mr. Pipes's investigation into the allegations that</p> <p>22 these women made -- that any of these women made?</p> <p>23 A. Not that I recall.</p> <p>24 Q. By "documents," I would -- you know,</p> <p>25 conclusionary reports or investigative reports or</p>
<p>Page 21</p> <p>1 harassed, mistreatment in the office, prejudicial</p> <p>2 treatment, stuff like that.</p> <p>3 Q. Do you know of an allegation that she made</p> <p>4 involving touching, where Gregg -- she alleged --</p> <p>5 whether she alleged that Gregg Roman touched her in a</p> <p>6 sexual way?</p> <p>7 A. I don't recall specifically, but I take your</p> <p>8 word that those were one of the allegations.</p> <p>9 Q. I'll represent to you that the allegation</p> <p>10 involving touching allegedly occurred on a work trip to</p> <p>11 Israel. Does that help your recollection?</p> <p>12 A. Sure. I guess that sounds a little more</p> <p>13 familiar.</p> <p>14 Q. You recall that?</p> <p>15 A. I recall being told something like that.</p> <p>16 Q. How about an allegation that another employee</p> <p>17 named Patricia McNulty and an unwanted sexual touching,</p> <p>18 do you have any knowledge of allegations like that?</p> <p>19 A. I have knowledge that Patricia was one of the</p> <p>20 ladies who was part of this group of aggrieved ladies</p> <p>21 and that she had complaints. Again, I don't know the</p> <p>22 specifics. As I mentioned, I haven't even read the</p> <p>23 Complaint -- Complaints.</p> <p>24 Q. Have you ever discussed anything with</p> <p>25 Mr. Pipes related to whether he investigated these</p>	<p>Page 23</p> <p>1 witness statements, things like that.</p> <p>2 A. Right. Not that I recall.</p> <p>3 Q. Okay. Do you know anything about a</p> <p>4 counterclaim that was -- that the Middle East Forum made</p> <p>5 in this case, Lisa Barbounis versus Middle East Forum?</p> <p>6 A. I do know that Gregg and Daniel have filed</p> <p>7 counterclaims.</p> <p>8 Q. Do you know anything about those</p> <p>9 counterclaims?</p> <p>10 A. Well, they reported to me that they've been</p> <p>11 doing their own investigating and that they've assured</p> <p>12 me that the complainants are not only incorrect, but are</p> <p>13 doing things for ulterior motives.</p> <p>14 Q. Have you ever seen any evidence to support</p> <p>15 that claim?</p> <p>16 A. No.</p> <p>17 Q. Have you ever discussed with Mr. Pipes</p> <p>18 terminating Mr. Roman's employment with the Middle East</p> <p>19 Forum and severing all relations with Mr. Roman?</p> <p>20 A. We have discussed it not at my suggestion.</p> <p>21 Q. At whose suggestion was that discussed?</p> <p>22 A. It came up in the context of Gregg needing to</p> <p>23 be out of the office and stationing him in Israel and</p> <p>24 whether or not he could fulfill his duties -- his</p> <p>25 initial job description from afar.</p>

<p>Page 24</p> <p>1 Q. Have you ever heard about anyone discussing 2 whether or not to sever ties with Mr. Roman in 3 connection to the allegations of sexual harassment that, 4 you know, all these women made? 5 MR. WALTON: I'll place an objection to 6 form. But you can answer, Steve. 7 BY MR. CARSON: 8 Q. Has it ever been discussed? 9 A. I think the point of the conversations at the 10 time was that Gregg was not getting along with people in 11 the office and vice versa and -- but Daniel found him to 12 be quite valuable to the organization. So his solution 13 was to simply take him out of the office and change his 14 duties so he wasn't interacting with those people. 15 Q. Did Mr. Pipes say that Mr. Roman was too 16 valuable to fire? 17 A. Those weren't exactly his words. Gregg is 18 very effective at what he does. 19 Q. Something to the extent of, we need him too 20 badly, we can't get rid of him? 21 MR. WALTON: Objection to form. 22 THE WITNESS: Not that we can't. He was 23 like a real asset. He was doing great things for us. 24 BY MR. CARSON: 25 Q. In your mind, at what point do you weigh</p>	<p>Page 26</p> <p>1 A. Well, it's a formal position. We have 2 certain responsibilities and he is on the executive 3 committee. 4 Q. So Gregg Roman is both the director of the 5 Middle East Forum and a member of the executive 6 committee and a corporate officer, correct? 7 A. Is his title director? 8 Q. Well, his employee title I believe is 9 director. I mean, do you know that -- 10 A. Okay. Okay. 11 Q. I mean, if you don't know that, you can say, 12 I didn't know his title directly -- director. 13 A. Yeah, I -- 14 Q. I don't want to put words in your mouth, Mr. 15 Levy. 16 A. Yeah, I'm not sure exactly, but... 17 Q. Do you know what the position -- so Daniel 18 Pipes holds a position of president on the executive 19 committee and as an officer, but I believe that's also 20 his title of the Middle East Forum; is that fair to say? 21 A. Sure. 22 Q. And so then the next position underneath Mr. 23 Pipes in the hierarchy would be Gregg Roman, correct? 24 A. Yes. 25 MR. CARSON: That might be all. Can you</p>
<p>Page 25</p> <p>1 protecting the female employees who work with Gregg 2 Roman over the great things he does for the Forum or -- 3 A. Well -- 4 Q. Go ahead. 5 A. To the extent that there was friction, Daniel 6 solved the problem by getting Gregg out of the office. 7 Q. Are you aware of whether complaints involving 8 Gregg Roman continued even after Mr. Roman was told he 9 could not come to the office anymore? 10 A. No. 11 Q. Do you know whether -- so to understand your 12 answer, Mr. Pipes never told you about any reports of 13 retaliation? 14 MR. WALTON: Objection to form. You can 15 answer. 16 THE WITNESS: No. No. No one -- it was 17 not reported to me that people in the office were 18 complaining about somebody who was no longer there. Nor 19 involved with managing them. 20 BY MR. CARSON: 21 Q. Do you know what it means for Gregg Roman to 22 be -- I might have already asked this. If I did, I 23 apologize. Do you know what it means for Gregg Roman to 24 be listed as an officer of the executive committee and 25 specifically the secretary? What does that job entail?</p>	<p>Page 27</p> <p>1 guys just give me, like, a minute just to think -- 2 collect my thoughts and then -- 3 MR. WALTON: Sure, Seth. Mr. Levy, if 4 you just want to take a quick break, a comfort break and 5 just to turn off your video -- turn off your sound too, 6 please, and just check in in about five or ten minutes. 7 MR. CARSON: Yeah, like 2:42, just five 8 minutes from now. 9 THE WITNESS: Okay. I'll be listening. 10 MR. CARSON: Okay. Thank you, Mr. Levy. 11 MR. WALTON: Thank you. 12 THE VIDEOGRAPHER: So we are off the 13 record, 2:37 p.m. 14 (A recess was taken from 2:37 p.m. until 2:45 p.m.) 15 MR. CARSON: Yeah, I think I'm done, Mr. 16 Levy. Thank you for your time. 17 (Witness excused.) 18 (The deposition was concluded at 2:45 p.m.) 19 * * * 20 21 22 23 24 25</p>

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1 SIGNATURE PAGE

2 OF

3 STEVEN LEVY

4
5 I hereby acknowledge that I have
6 read the foregoing deposition, dated TUESDAY, NOVEMBER
7 24, 2020, and that the same is a true and correct
8 transcription of the answers given by me to the
9 questions propounded, except for the changes, if any,
10 noted on the attached errata sheet.

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13 SIGNATURE:

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C E R T I F I C A T E

I, Pamela Pratt, Court Reporter and Notary Public in and for the Commonwealth of Pennsylvania, certify that the foregoing is a true and accurate transcript of the deposition of said witness taken by me on the date and place hereinbefore set forth.

I further certify that I am neither attorney nor counsel for, nor related to or employed by, any of the parties to the action in which this deposition was taken, and further, that I am not a relative or employee of any attorney or counsel employed in this action, nor am I financially interested in this case.

Pamela Pratt, Court Reporter
Notary Public

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